

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

HARRISON COMPANY LLC,	§	
	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO. 3:19-CV-1057-B
	§	
A-Z WHOLESALERS INC. and	§	
BARKAT G. ALI,	§	
	§	
Defendants.	§	

**FOURTH JOINT NOTICE OF AGREEMENT
TO EXTEND DEPOSITION DEADLINE**

Plaintiff Harrison Company LLC (“Plaintiff”), and Defendants A-Z Wholesalers Inc. and Barkat G. Ali (collectively, “Defendants”), file this Joint Notice of Agreement to Extend Deposition Deadline, pursuant to Paragraph 5 of the Court’s Scheduling Order (Doc. 9), and state:

1. Pursuant to the Court’s Scheduling Order (Doc. 9), and the parties Third Joint Notice of Agreement to Extend Discovery Deadline (Doc. 78), the parties are to complete depositions by November 30, 2020.

2. Trial in this matter has been re-set for February 1, 2021 (Doc. 77). The earliest pre-trial deadline in January 18, 2021. *Id.*

3. On November 4, 2020, Plaintiff filed its Motion to Clarify and Reconsider (Doc. 79) and Brief in Support (Doc. 80), seeking clarification regarding the Court’s Memorandum Opinion and Order (Doc. 76).

4. As stated in the certificate of conference to that motion, Defendants are not opposed to Plaintiff's motion to the extent it seeks clarification regarding (i) the claims and defenses at issue for trial; (ii) the specific fact issues for the jury to resolve at trial; and/or (iii) the element of a claim or defense to which any fact issue relates.

5. Extending the deposition deadline gives the Court an opportunity to rule on Plaintiff's motion before witnesses are deposed. Indeed, to the extent depositions are necessary in this case, the requested clarification will help the parties' to focus and limit the scope of those depositions. Moreover, with COVID-19 cases increasing—and Plaintiff's representatives in Louisiana—an extension allows the parties and their counsel to avoid any immediate travel.

5. Accordingly, the parties have agreed to extend the time to complete depositions until December 31, 2020. No other deadlines are affected by this agreement.

Respectfully submitted,

/s/ Joseph A. Unis, Jr.

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CERTIFICATE OF SERVICE

I certify that on November 11, 2020, I served this document on all counsel of record via the ECF system and/or email.

/s/ Joseph A. Unis, Jr.
Counsel for Plaintiff